

### **REMARKS**

Pursuant to the present amendment, claim 18 has been amended. Claims 1-69 are pending in the present application. No new matter has been introduced by way of the present amendment. Reconsideration of the present application is respectfully requested.

As an initial matter, the specification has been amended to set forth the earlier application to which the present application claims benefit. Acceptance of the amendment to the specification and confirmation that Applicants have complied with all requirements to perfect the claimed priority to the identified provisional application is respectfully requested.

The Examiner also objected to the claim language employed in claims 1, 18, 19 and 57. Applicants respectfully traverse this objection. More specifically, the objection is believed to be improper because the current claim language accurately reflects the claimed invention in the identified claims. For example, claim 1 recites the locking mandrel engages the plurality of locking segments at at least three discrete, spaced apart engagement areas. In claim 1, there are “at least three” engagement areas. The claim calls for the locking mandrel to engage each of the multiple locking segments, at these “at least three” engagement areas. In the illustrative embodiment depicted in Figures 2a and 2d, the three illustrative engagement areas are identified by the reference numbers 61a, 61b and 61c. Specification at p. 11, l. 15 – p. 12, l. 29. Thus, it is believed that the current claim language accurately describes the claimed inventions. Of course, the claimed inventions are not limited to the illustrative embodiments disclosed in the specification. Withdrawal of the objection to claims 1, 18, 19 and 57 is respectfully requested.

In the Office Action, claims 1-69 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by the Cameron brochure. Applicants respectfully traverse the Examiner’s rejections.

The present application sets forth various problems associated with prior art hydraulic connectors. Specification at p. 1, l. 11 – p. 2, l. 13. The hydraulic connectors disclosed in the present application may be employed to reduce or solve or more of those problems.

For example, claim 1 is directed to an illustrative embodiment wherein a connector comprises a locking mandrel that, when actuated, is adapted to engage each of the plurality of locking segments at three or more discrete, spaced apart engagement areas. As pointed out in the specification, by providing at least three engagement areas, more uniform loading is provided since the loads are more evenly distributed. See, *e.g.*, specification at p. 11, l. 15 – p. 12, l. 2. In contrast, the connector disclosed in the Cameron brochure comprises a locking mandrel A (see attached annotated version of the Cameron brochure) that engages each of a plurality of locking segments B at only two engagement areas,  $C_1$ ,  $C_2$ . Thus, contrary to the position taken by the Examiner, the connector disclosed in the Cameron brochure does not anticipate claim 1, or any claims depending therefrom, *i.e.*, claims 2-17, for at least this reason. Independent claims 32, 46 and 57 contain a similar or more restrictive limitation with respect to the three discrete, spaced apart engagement areas. Thus, claims 32-69 are not anticipated for at least this reason.

Independent claim 18 recites that there are at least two discrete substantially flat engagement surfaces that are substantially parallel to an axis of the first and second components when mated. Support for this amendment may be found at, for example, p. 12, ll. 4-19. As thus amended, it is respectfully submitted that the connector in the Cameron brochure does not anticipate amended claim 18. The engagement surfaces  $D_1$  and  $D_2$  (see attached) are not substantially flat surfaces that are substantially parallel to the axis of the mated first and second components, as required by amended claim 18. Rather, the surfaces  $D_1$  and  $D_2$  are tapered surfaces that are positioned at an angle with respect to the axis of the mated first and second components. The specification describes at least some advantages that may be achieved through

use of the substantially flat engagement areas set forth in amended claim 18. for example, they may provide a more secure and stable connection as they do not have a tendency to separate as do tapered engagement surfaces. Moreover, in some cases, the use of such substantially flat engagement surfaces may avoid the use of various locking mechanisms to insure that the mated connection does not loosen. See, *e.g.*, specification at p. 13, ll. 14-23. Of course, all embodiments of the connector defined by claim 18 need not provide any or all of these advantages. Thus, it is respectfully submitted that claims 18-31 are not anticipated for at least this reason.

For at least the aforementioned reasons, it is respectfully submitted that all pending claims are in condition for immediate allowance. The Examiner is invited to contact the undersigned attorney at (713) 934-4055 with any questions, comments or suggestions relating to the referenced patent application.

Respectfully submitted,

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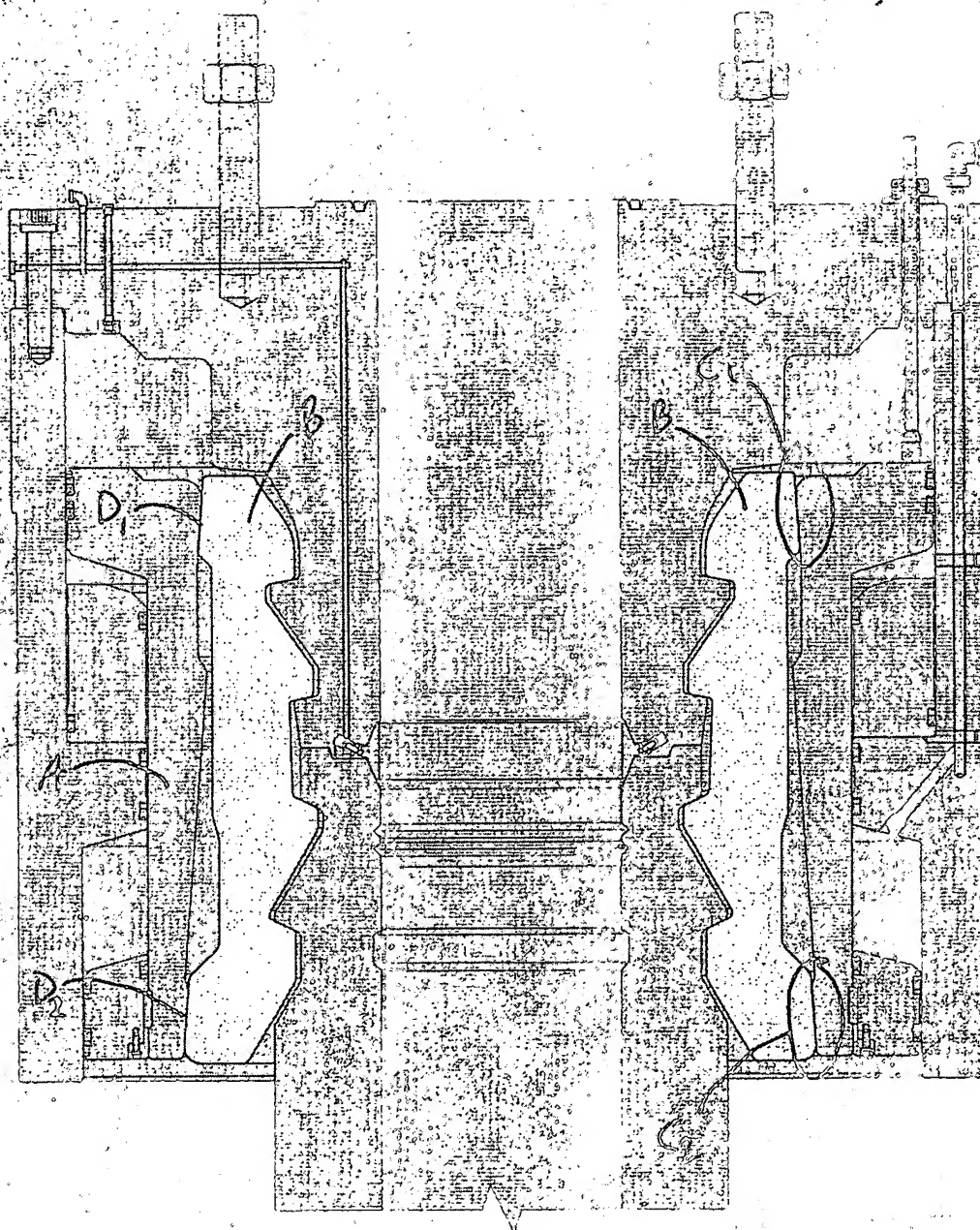


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# Deepwater High Capacity Collet Connector



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